

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)	
IMPLANT PRODUCTS LIABILITY)	MDL NO. 2272
LITIGATION)	
)	
This Document Relates to All Cases)	Master Docket Case No. 1:11-cv-05468
)	
)	Honorable Rebecca Pallmeyer

**DEFENDANTS' MOTION FOR AN ORDER
CONCERNING CONTACT WITH PHYSICIANS**

Zimmer respectfully requests that the Court enter an order governing contact with and retention of treating physicians as defense experts in this MDL and in support of its Motion states as follows:

1. Zimmer would like to communicate with, and possibly retain as experts, one or more surgeons who also happen to have treated patients who are plaintiffs in these consolidated cases. In Zimmer's view, there is no law prohibiting that.
2. Zimmer seeks an order confirming Zimmer's right to meet with physicians about their possibly consulting or testifying as defense experts in cases brought by plaintiffs whom the physicians have not treated, subject to certain safeguards.
3. In support of its motion, Zimmer submits a supporting memorandum and proposed order.

Respectfully submitted,

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Zimmer US, Inc., and Zimmer Production, Inc.*

CERTIFICATE OF SERVICE

I certify that on June 4, 2012, a copy of the foregoing Defendants' Motion For An Order Concerning Contact With Physicians was filed electronically. Parties may access this filing through the Court's system.

/s/ Joseph H. Yeager, Jr.